



Qwest
607 14th Street NW, Suite 950
Washington, DC 20005
Phone 202.429.3121
Fax 202.293.0561

Cronan O'Connell
Vice President-Federal Regulatory

EX PARTE

Electronic Filing via ECFS

December 14, 2004

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of Unbundled Access to Network Elements, WC Docket No. 04-313; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, CC Docket No. 01-338

Submitted at the Request of Commission Staff

Dear Ms. Dortch:

At the request of the staff of the Federal Communications Commission and pursuant to 47 C.F.R. §§ 1.1203(a)(1), 1.1204(a)(10)(iii) and 1.1204(a)(10)(iv), the following *ex parte* communication is submitted for inclusion in the record of the above-captioned dockets.

On Wednesday, December 8, 2004, Qwest filed an *ex parte* submission providing additional information regarding its proposal to adopt prohibiting the conversion of special access circuits. In the *ex parte*, Qwest included a chart that showed the ratio of DS1 and DS3 loops purchased as special access channel terminations versus UNEs by carriers in our region.

Yesterday, Qwest identified an error in the spreadsheets that were used to generate the summary results in the December 8 submission, as well as an error in the description of the data. As a result, Qwest is submitting a revised summary sheet that corrects the errors. In particular, Qwest has revised both the title and the categories to reflect that the summary represents *facilities* purchased - not revenue. Additionally, Qwest has revised the percentages for "All others" under the *SPECIAL ACCESS vs. UNE DS1s (Loops and EELs; SPECIAL ACCESS vs. UNE DS3s (Loops and EELs); and Total DS1s and DS3s (formerly Total Spent on DS1s and DS3s)*. Finally, Qwest corrects a statement in the third sentence of the second paragraph in the cover letter for the December 8 submission. The sentence should read as follows: "Indeed, as shown in the

Ms. Marlene Dortch
December 14, 2004
Page 2 of 2

attached chart, 56 percent of the DS1 loops purchased from Qwest by these carriers have been purchased as UNEs.”

In accordance with FCC rule 1.49(f), this *ex parte* letter is being filed electronically *via* the Electronic Comment Filing System for inclusion in the public record of the above-referenced dockets pursuant to FCC Rule 1.1206(b)(2).

Sincerely,

/s/ Cronan O’Connell

Attachment

Copy to:

Scott Bergmann (scott.bergmann@fcc.gov)
Daniel Gonzalez (daniel.gonzalez@fcc.gov)
Christopher Libertelli (christopher.libertelli@fcc.gov)
Matthew Brill (matthew.brill@fcc.gov)
Jessica Rosenworcel (jessica.rosenworcel@fcc.gov)
Bryan Tramont (bryan.tramont@fcc.gov)
Jeffrey Carlisle (jeffrey.carlisle@fcc.gov)
Michelle Carey (michelle.carey@fcc.gov)
Linda Kinney (linda.kinney@fcc.gov)
Thomas Navin (thomas.navin@fcc.gov)
Austin Schlick (austin.schlick@fcc.gov)
John Stanley (john.stanley@fcc.gov)
Linda Kinney (linda.kinney@fcc.gov)
Jeffrey Dygert (jeffrey.dygert@fcc.gov)
Jeremy Miller (jeremy.miller@fcc.gov)
Russell Hanser (russell.hanser@fcc.gov)
Carol Simpson (carol.simpson@fcc.gov)

Comparison of Special Access Channel Terminations to UNE Loops/EELs purchased by Category of Carrier. Updated by Qwest December 14, 2004

The following reflects the purchases of Special Access channel terminations and UNE Loops/EELs by each category of carrier - in other words, the numbers add up to 100% of what each carrier category purchases.

DS1: SPECIAL ACCESS vs. UNE (Loops and EELs)

	<i>DS1 SA</i>	<i>DS1 UNE</i>
Big 3 IXC's	100%	0%
All others	44%	56%
Wireless	100%	0%

DS3: SPECIAL ACCESS vs. UNE (Loops and EELs)

	<i>DS3 SA</i>	<i>DS3 UNE</i>
Big 3 IXC's	100%	0%
All others	96%	4%
Wireless	100%	0%

TOTAL DS1s and DS3s

	<i>DS1 + DS3 SA</i>	<i>DS1 + DS3 UNEs</i>
Big 3 IXC's	100%	0%
All others	45%	55%
Wireless	100%	0%

The following reflects the number of Special Access and UNE DS1/DS3 Loops and EELs purchased as a percentage of the total "buckets" of Special Access channel terminations and UNE Loops/EELs sold

OF ALL SPECIAL ACCESS CHAN TERMS SOLD

	<i>DS1</i>	<i>DS3</i>	<i>TOTAL OF ALL SOLD</i>
Big 3 IXC's	59%	59%	59%
All others	20%	26%	20%
Wireless	22%	15%	21%

OF ALL UNE DS1 + DS3 LOOPS AND EELS SOLD

	<i>DS1</i>	<i>DS3</i>	<i>TOTAL OF ALL SOLD</i>
Big 3 IXC's	0%	0%	0%
All others	100%	100%	100%
Wireless	0%	0%	0%